

## EXHIBIT 2

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND  
COMPOUNDING PHARMACY,  
INC. PRODUCTS LIABILITY      MDL No. 2419  
LITIGATION  
  
Master Dkt:  
1:13-md-02419-RWZ

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THIS DOCUMENT RELATES  
TO:

All Actions

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VIDEOTAPED DEPOSITION OF  
SCOTT BUTLER

9:03 a.m.  
February 5, 2015

Suite 1100  
315 Deaderick Street  
Nashville, Tennessee

Blanche J. Dugas, RPR, CCR No. B-2290

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1 on the roster.

2 Q. What about Rebecca Climer?

3 A. I don't know if she -- she might have come  
4 to one of the meetings.

5 Q. Okay. So she may have attended one of the  
6 face-to-face meetings; is that correct?

7 A. She might have.

8 Q. All right. And is she the chief  
9 communications and marketing officer for St. Thomas  
10 Health?

11 A. I think so.

12 Q. Is it your understanding that she was the  
13 head PR person inside St. Thomas Health?

14 A. Yes.

15 Q. Okay. And do you know why it is that she  
16 came to one of the meetings?

17 A. I think we asked for her to come to the  
18 meeting because we needed help.

19 Q. And you needed help with what specifically?

20 A. I think getting the message out to  
21 patients. That was one of our biggest concerns at the  
22 time was that we wanted to find every possible way.  
23 You know, we had Internet, we had phone calls, we had  
24 letters, we wanted to make sure there was -- that we  
25 were getting to every one of the patients to make sure



1 that they knew what was going on, to get help if they  
2 needed it.

3 Q. So would I be correct in understanding that  
4 at this point, shortly after the outbreak, and the  
5 days and weeks following the outbreak, Howell Allen  
6 Clinic and St. Thomas Neurosurgical's chief concern  
7 was getting the word out to patients so that patients  
8 could receive treatment if necessary; is that true?

9 A. Yes.

10 Q. Okay. And Howell Allen Clinic and St.  
11 Thomas Neurosurgical, they were willing to do whatever  
12 it took to get the word out to those patients so that  
13 people could request or get treatment if necessary; is  
14 that true?

15 A. Yes.

16 Q. Were there any other concerns that Howell  
17 Allen Clinic and St. Thomas Neurosurgical were focused  
18 on during these weeks immediately after the outbreak?

19 A. I think I was -- I was concerned about the  
20 media side of it just simply because I had never had  
21 any -- I've never had to interact with the media in my  
22 career. And so I was getting phone calls every  
23 30 minutes from newspapers, radio stations, news  
24 channels and I've never, ever dealt with that before.  
25 And so that was one of my questions to Rebecca Climer

## DISCLOSURE

Pursuant to Article 10.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia which states: "Each court reporter shall tender a disclosure form at the time of the taking of the deposition stating the arrangements made for the reporting services of the certified court reporter, by the certified court reporter, the court reporter's employer or the referral source for the deposition, with any party to the litigation, counsel to the parties, or other entity. Such form shall be attached to the deposition transcript," I make the following disclosure:

I am a Georgia Certified Court Reporter. I am here as a representative of Discovery Litigation Services, LLC. Discovery Litigation Services, LLC was contacted to provide court reporting services for the deposition. Discovery Litigation Services, LLC will not be taking this deposition under any contract that is prohibited by O.C.G.A. 9-11-28(c).

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Blanche J. Dugas  
CCR No. B-2290

1 STATE OF GEORGIA:

2 COUNTY OF FULTON:

3  
4 I hereby certify that the foregoing  
5 transcript was reported, as stated in the  
6 caption, and the questions and answers  
7 thereto were reduced to typewriting under  
8 my direction; that the foregoing pages  
9 represent a true, complete, and correct  
10 transcript of the evidence given upon said  
11 hearing, and I further certify that I am  
12 not of kin or counsel to the parties in the  
13 case; am not in the employ of counsel for  
14 any of said parties; nor am I in any way  
15 interested in the result of said case.

16  
17 February 10, 2015.

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20 BLANCHE J. DUGAS, CCR-B-2290  
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22  
23  
24  
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CAPTION

The Deposition of SCOTT BUTLER, taken in the matter, on the date, and at the time and place set out on the title page hereof.

It was requested that the deposition be taken by the reporter and that same be reduced to typewritten form.

It was agreed by and between counsel and the parties that the Deponent will read and sign the transcript of said deposition.

DEPOSITION ERRATA SHEET

DLS Assignment No. 20639

Case Caption: In Re: New England Compounding  
Pharmacy, et al.

Witness: SCOTT BUTLER - 02/05/2015

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I have read  
the entire transcript of my deposition taken in the  
captioned matter or the same has been read to me, and  
The same is true and accurate, save and except for  
changes and/or corrections, if any, as indicated by me  
on the DEPOSITION ERRATA SHEET hereof, with the  
understanding that I offer these changes as if still  
under oath.

Signed on the \_\_\_\_\_ day of

\_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
SCOTT BUTLER